

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-CV-00352-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (“Verizon”), (collectively, the “Parties”) respectfully file this Joint Motion to Amend the Docket Control Order and would show the Court as follows:

The current deadline for the Parties to file the Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations was May 12, 2025. The Parties recently requested a brief extension of this deadline to May 14, 2025, to allow additional time for the Parties to narrow disputes in advance of the Pretrial Conference, which is currently set for May 19, 2025. The Parties respectfully request a further brief extension of the deadline to file these papers to May 16, 2025, to allow additional time for the Parties to narrow disputes.

The Parties further note: on May 13, 2025, the Parties jointly requested that the May 19, 2025 Pretrial Conference be reset to May 30, 2025, for judicial efficiency purposes. *See* Dkt. 278.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have met and conferred and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion to Amend the Docket Control Order (Dkt. No. 131) as follows:

Original Date	Amended Date	Event
May 12, 2025	May 16, 2025	*Notify Court of Agreements Reached During Meet and Confer The parties are ordered to meet and confer on any outstanding objections or motions <i>in limine</i> . The parties shall advise the Court of any agreements reached no later than 1:00 p.m. three (3) business days before the pretrial conference.
May 12, 2025	May 16, 2025	*File Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations

Dated: May 14, 2025

Respectfully submitted,

By: /s/ Marc Fenster

By: /s/ Josh Krevitt

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and Verizon Corporate Services Group Inc.*

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements of Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster

Marc Fenster

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 14, 2025.

/s/ Marc Fenster

Marc Fenster